

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	
	:	CRIMINAL NO. 20-__
v.		DATE FILED:
	:	VIOLATION:
LAURANCE SMITH		18 U.S.C. § 641 (conversion of government funds – 1 count)
	:	Notice of Forfeiture

I N F O R M A T I O N

COUNT ONE

(Conversion of Government Funds)

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this information:

1. The Social Security Administration (“SSA”), an agency of the United States, administered certain government benefit programs, including the Disability Insurance Benefits (“DIB”) program, pursuant to Title 42, United States Code, Sections 401-433.
2. The DIB program, which was established to be self-financing, provided monthly cash benefits to those who qualify as “disabled,” as that term was defined for the purposes of the Social Security Act. DIB are available if a person worked a required length of time and had a medical condition that prevented the individual from working for at least 12 months.
3. DIB payments continued until the individual reached full retirement age or died.
4. The husband of defendant LAURANCE SMITH, identified herein as “L.H.,” received DIB benefits during his lifetime. No other individual was entitled to the benefits

designated for L.H. and the benefits were to be suspended upon the passing of L.H. The SSA provided these benefits through an electronic funds transfer to a bank account held in the name of L.H.

5. L.H. died on or about December 17, 2015.

6. SSA has no record of timely notification of L.H.'s death and continued to issue DIB benefits through electronic funds transfers to L.H.'s bank account.

7. Defendant LAURANCE SMITH improperly received and converted the benefit payments for L.H. to her own use.

8. From in or about January 2016 to in or about August 2019, defendant LAURANCE SMITH improperly received and converted to her own use approximately \$51,359.00 in SSA benefit payments intended for L.H.

9. Beginning in or about January 2016, and continuing through in or about August 2019, in the Eastern District of Pennsylvania and elsewhere, defendant

LAURANCE SMITH

knowingly converted to her own use money of the United States in excess of \$1,000, that is, approximately \$51,359.00 in SSA benefits to which the defendant knew she was not entitled.

In violation of Title 18, United States Code, Section 641.

NOTICE OF FORFEITURE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 641, set forth in this information, defendant

LAURANCE SMITH

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offense; including but not limited to the sum of \$51,359.00.

2. If any of the property subject to forfeiture, as a result of any act or commission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 28, United States Code, Section 2461(c), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18,
United States Code, Section 981(a)(1)(C).

A handwritten signature in blue ink that reads "Ronald Barock for". The signature is written in a cursive style.

WILLIAM M. MCSWAIN
United States Attorney

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

LAURANCE SMITH

INFORMATION

18 U.S.C. § 641 (conversion of government funds – 1 count)
Notice of Forfeiture

A true bill.

Foreman

Filed in open court this _____ day,
of _____ A.D. 20 _____

Clerk

Bail, \$ _____